



**Cook Inlet GP, - Chemical Additive Limitation**

**Richard Cool** to: Cindi Godsey

Cc: Alfred Vann

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Hi Cindi:

I am contacting you with an observation/interpretation about the Cook Inlet GP. If you see any problem or concern, please let us know.

Al is working with Hilcorp on DMR anomalies and he shared with me some of their DMR information on how they are reporting Chemical Additive compliance data under the GP, Part II. F.3., which is applicable to Outfalls 005-014. That part provides in relevant part as follows:

The concentration of treatment chemicals in discharged *seawater or freshwater* shall not exceed the most stringent of the following three constraints: . . . (italics added)

The two italicized terms initially struck me as peculiar and I wondered if they were intended as some type of limiting factor in terms of which Outfalls 005-014 this provision applied to. The Fact Sheet text, pages 29-30, discusses chemicals used to "treat seawater and freshwater" used in offshore operations and the text references biocides, scale inhibitors and corrosion inhibitors. I cannot find further explanation in the RTC.

So Part II.F.3. is applicable to any discharge that contains water and water treatment chemicals. This provision is more limited in scope than a provision that would apply to any chemical additive made to any of the discharges 005-014.

Thanks

Rick